

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) CASE NO: 11-42501-399 Chapter 13
PATRICIA J KOENEMAN)
) Trustee's Objection to Confirmation
)
) Original confirmation hearing
Debtor(s)) set for Jul 11, 2011 10:00 AM

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. The plan does not provide sufficient funds to pay all creditors entitled to full payment, including fair market value of secured claims and priority debts. 11 USC Secs. 1322(a)(2) & 1325(a)(5)(B)(ii)
2. The plan fails to pay the full attorney fee owed per the 2016(b) form.
3. Debtor lacks sufficient income to fund the plan.
4. The set monthly payments to be made by the Trustee exceed the plan payment.
5. The plan is ambiguous or incapable of ascertainment (11 U.S.C. Secs. 1321 & 1325(a)(3)) because:

PLAN PAYS MOBILE HOME DEBT IN FULL BUT CONTAINS
INSUFFICIENT FUNDS TO DO SO WITH CLAIM AS FILED.
(VALUATION ISSUE)

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

/s/ John V. LaBarge, Jr.

KLW-221

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